

KURT C. FAUX, ESQ.  
Nevada Bar No. 003407  
JORDAN F. FAUX, ESQ.  
Nevada Bar No. 12205  
THE FAUX LAW GROUP  
2625 N. Green Valley Pkwy., #100  
Henderson, Nevada 89014  
Telephone: (702) 458-5790  
Facsimile: (702) 458-5794  
Email: kfaux@fauxlaw.com  
jfaux@fauxlaw.com

*Attorneys for Insurance Company of the West*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

INSURANCE COMPANY OF THE WEST, a  
foreign corporation,

Plaintiff,

v.

RENO QUALITY HOMES, INC., a Nevada  
corporation, HIGH VALLEY  
DEVELOPMENT, LLC, a Nevada limited  
liability company, ROBERT N.  
FITZGERALD, an individual, SHERYL A.  
FITZGERALD, an individual, THE ROBERT  
N. FITZGERALD IRREVOCABLE TRUST, a  
Nevada Trust, THE SHERYL FITZGERALD  
IRREVOCABLE TRUST, a Nevada Trust,  
ROBERT N. FITZGERALD, as the Trustee for  
The Robert N. Fitzgerald Irrevocable Trust and  
as Trustee for The Sheryl Fitzgerald Irrevocable  
Trust, DOES I through X, inclusive; ROE  
CORPORATIONS I through X, inclusive,

Defendants.

CASE NO: 2:17-cv-01272-RFB-DJA

**STIPULATION AND ORDER TO EXTEND  
TIME FOR PLAINTIFF TO RESPOND TO  
DEFENDANTS' BILL OF COSTS [ECF NO.  
73] AND DEFENDANTS' MOTION FOR  
COSTS AND ATTORNEY'S FEES [ECF  
NO. 74]**

Plaintiff, Insurance Company of the West ("ICW"), by and through its attorneys, The Faux Law Group, and Defendants Reno Quality Homes, Inc., Robert N. Fitzgerald, Sheryl A. Fitzgerald, The Robert N. Fitzgerald Irrevocable Trust, The Sheryl Fitzgerald Irrevocable Trust, Robert N. Fitzgerald as Trustee of the Sheryl Fitzgerald Irrevocable Trust and the Robert N. Fitzgerald Irrevocable Trust ("Defendants"), by and through their counsel of record, Dotson Law, hereby agree and stipulate to extend the time allowed for ICW to respond to Defendants' Bill of Costs [ECF No. 73]

1 and Defendants' Motion for Costs and Attorney's Fees [ECF No. 74] for two weeks, or until April 14,  
2 2020.

3 Defendants' shall have until April 21, 2020 to file their Replies.

4 This is the first request to extend the time for ICW to file these responsive pleadings. This  
5 Stipulation is made for good cause and not for the purposes of delay. The reason for the request is due  
6 to the effects of COVID-19 including school closures and delays related to attempting to work from  
7 home. Nothing contained in this Stipulation shall be deemed a waiver of any right belonging to any  
8 party hereto.

9 DATED this 25th day of March, 2020.

DATED this 25th day of March, 2020.

10 **THE FAUX LAW GROUP**

11 **DOTSON LAW**

12 By: /s/ Jordan F. Faux  
13 Kurt C. Faux, Esq.  
14 Nevada Bar No. 3407  
15 Jordan F. Faux, Esq.  
16 Nevada Bar No. 12205  
17 2625 N. Green Valley Parkway, #100  
18 Henderson, NV 89074  
19 *Attorneys for Insurance Company of the*  
20 *West*

By: /s Robert A. Dotson  
Robert A. Dotson, Esq.  
Nevada Bar No. 5285  
Justin C. Vance  
Nevada Bar No. 11306  
5355 Reno Corporate Drive  
Suite #100  
Reno, Nevada 89511  
*Attorneys for Defendants Reno Quality*  
*Homes, Inc., Robert N. Fitzgerald, Sheryl A.*  
*Fitzgerald, The Robert N. Fitzgerald*  
*Irrevocable Trust, The Sheryl Fitzgerald*  
*Irrevocable Trust, Robert N. Fitzgerald as*  
*Trustee of the Sheryl Fitzgerald Irrevocable*  
*Trust and the Robert N. Fitzgerald*  
*Irrevocable Trust*

23 **ORDER**

24 **IT IS SO ORDERED.**

25 DATED this 27th day of March, 2020.

26  
27 

28 RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE